

EXHIBIT O

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

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THOMAS FRANKBERRY and SANSANI FRANKBERRY,

Plaintiffs,

Civil Action No.: 6-20-cv-3120-TMC

-against-

SIG SAUER, INC.,

Defendants.

**CERTIFIED
TRANSCRIPT**

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Remote Deposition
New York, New York 11716

September 16, 2021
10:06 a.m.

DEPOSITION of SEAN TONER, on behalf of the
Defendant herein, taken by the Plaintiff, held
at the above-mentioned time and place, before
KIARA MILLER, a Notary Public of the State of
New York.

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2 function, what do you mean by that?

3 So are you saying that outside of
4 shooting the weapon?

5 **Q Right. That's correct.**

6 A I mean, we did some things like
7 cycle testing where we wouldn't have to
8 shoot the weapon, we could cycle test it
9 without firing a shot. So, in other words,
10 we did what is known as dry firing.

11 So what that means is you don't
12 have any ammunition in the weapon, you
13 essentially pull the trigger, release the
14 striker, and then hand cycle the slide, and
15 do that repeatedly for a larger number of
16 cycles.

17 We've also done things with
18 machines that simulate firing, you know,
19 basically what I was just describing, where
20 it pull the trigger cycle, slide repeatedly
21 so that you don't have to have a person
22 doing it. Things like that.

23 I can't think of any other type of
24 testing that would fall into that category.

25 **Q Do you do any testing for**

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accidental discharges?

MR. GIBSON: Object to form.

A I'm not sure how that type of testing would even be performed, to be honest with you.

Q And that's okay, but that's a, no, you don't do any testing for that?

MR. GIBSON: Same objection.

A When you say accidental discharge, I don't even know what that means. So it's hard to say how you would create a test to evaluate that.

Q Do you do any testing on the gun as to whether it will dis -- to test whether or not it will discharge without a trigger pull?

A Outside of abusive testing, no.

Q Do you do any testing with holsters?

A Outside of whether they fit in the holster, no.

Q Why not?

A It depends on, you know, holsters are -- there's varying manufacturers of